

Internal Revenue Service

District
Director

Department of the Treasury

INTERNAL REVENUE SERVICE
P. O. BOX 1460, GP
BROOKLYN, N. Y. 11202

Date: MAR 18 1985

Person to Contact:

Contact Telephone Number:

Refer Reply to:

CERTIFIED MAIL

Dear Applicant:

We have reviewed your application for exemption under section 501(c)(7) of the Internal Revenue Code. Information presented indicates that you were formed pursuant to Section [redacted] of the Business Corporation Law of the State of [redacted] on [redacted] under the name of [redacted]. On [redacted] your organization amended its Articles of Incorporation to change its name to [redacted].

Your corporation was formed to promote or sponsor races which provide opportunities for bicyclists to compete on a national or regional basis, and to foster interest and participation in amateur bicycle competition.

Your income is derived from sponsors fees, entry fees, sale of shirts and caps and sales of programs.

Section 501(c)(7) of the Code from Federal income tax clubs organized and operated substantially for pleasure, recreation, and other non profitable purposes, no part of the net earnings which inures to the benefit of any private shareholder. In general, exemption from Federal income tax under this section encompasses social and recreational clubs which are supported solely by membership fees, dues and assessments.

On the basis of the evidence presented we hold that you are not organized and operated substantially for pleasure, recreation and other non profitable purposes. You are also not incorporated under the State's Business Corporation Laws. You are also not a social or recreational club supported solely by membership fees, dues and assessments.

Therefore, it is held that your organization does not qualify for exemption under section 501(c)(7) of the Code.

You are required to file a taxable return Form 1120 or 1041 with the District Director of Internal Revenue Service. Please send the return to the Internal Revenue Service, P.O. Box 1680, General Post Office, Brooklyn, New York 11202.

If you do not agree with the determination, you may request a Conference with the Regional Director of Appeals by protesting in accordance with enclosed instructions within 30 days.

Protestes submitted which do not contain all the documentation stated in the instructions will be returned for completions.

Very truly yours,

/s/ [REDACTED]

District Director

Enclosure: Publication 892